## **Bay Delta Conservation Plan Review Document Comment Form**

Document:	North Delta Activities Dec 5 2008 version			
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<b>Date:</b> _12-9-	-08			

Please use this form to document your comments to the above document. Please number your comments in the first column and indicate the page, section, and line number (if provided) that reference the comment's location in the review document in the next three columns. **Return completed comment forms to Rick Wilder (wilderrm@saic.com) and Pete Rawlings (rawlingsms@saic.com).** 

To be of the greatest value to the document development process, please make your comments as specific as possible (e.g., rather than stating that more current information is available regarding a topic, provide the additional information [or indicate where it may be acquired]; rather than indicating that you disagree with a statement, indicate why you disagree with the statement and recommend alternative text for the statement). Do not enter information in the **Disposition** column. This column will be used by SAIC to record how each comment was addressed during the document revision process.

No.	Page #	Section #	Line #	Comment	Disposition
1	1		General	Many of my previous comments have not been addressed and problems continue here: there is much that is assumed, believed, anticipated that will occur, and adverse effects are largely ignored, even as the document recognizes the uncertainties. The document needs an honest discussion of what is the objective and what are the potential consequences (good and bad) to allow a reasoned deliberation and decision.	
2	1		2	It has not been determined that this is a Conservation Measure. It is inaccurate to label it as such.	
3	1		6	The size of the facility necessary has not been determined and it is premature to assume it will be 15,000 cfs. The necessary size will be determined by, among other things, outflow and bypass flow requirements, as well as costs. Studies have shown a smaller facility allows larger bypass flows and, with screened intakes in the south Delta under a modified channel system that allows fish bypass into a protected Old River corridor, the water supply goals can be met. A largely isolated facility with adequate bypass flows will produce a facility with most of the capacity not used most of the time.	
4	1		9	It is claimed that the eastern alignment has fewer environmental impacts than the western. This should be explained and supported (since the western is largely underground, it is not obvious why the impacts would be greater in the western alignment).	
5	1		32-33	Size ranges should be provided for the screen approach	

	1		viologities and much those are linearin	
	1	42	velocities and mesh, these are known.	
6	1	42	Why is it anticipated an eastern route be would be	
		10	preferable?	
7	2	10	"throughout California" slightly exaggerates the extent	
			of the deliveries from the south Delta export pumps	
8	2	15	Planktonic fish, larvae and small juveniles are not	
			effectively salvaged	
9	2	18	There is evidence of predation in the release locations as	
			well.	
10	2	24	"are thought to have". This is a consistent theme in the	
			document and is a very weak justification for an	
			expensive project. Provide evidence.	
11	2	32	"is expected to". Again, this is a weak justification. The	
			lack of certainty underscores the need for a strategy that	
			does not risk massive stranded or non-performing assets.	
			A modest facility would be better suited to the	
			uncertainty.	
12	2	34-40	Need to discuss the trade off: increased effects on	
			migratory fish and reduced load of nutrients, food,	
			organic material, etc. from the Sacramento River to the	
			Delta of an upstream diversion.	
13	2	43	Fish screens in the South Delta with dual conveyance	
			and protected corridors with fish bypasses will also	
			achieve this, and it needs to be included in the	
			discussion here and in South Delta activities	
14	3	24-32	No data are provided to support this claim. A north	
		- 1 0 -	Delta diversion will also remove nutrients, organic	
			matter, zooplankton, phytoplankton, etc The phrase "is	
			expected to" in the last sentence highlights the weakness	
			of the claimed benefit. When there is uncertainty as	
			there is here, both the hoped for benefit and any negative	
			effects should be identified and discussed so an	
			informed comparison is made.	
15	3	38-40	"There is less need to maintain high water quality in the	
15		30-40	south Delta when high quality water is diverted from the	
			north Delta" PL 99-546 requires compliance with water	
			* *	
			quality standards at Rock Slough. The legal requirement	
			to maintain water quality in the South Delta remains.	
16	3	38-40	The need to maintain water quality in the court date	
10	3	30-40	The need to maintain water quality in the south delta	
			remains for water users in the south delta and for	
			fisheries. Reduced pumping in the south Delta without	
			addressing the temperature, pollutant discharge and San	
			Joaquin River flow issues will make for a stagnant area	
			of poor quality water and habitat conditions. These	
			effects need to be addressed, not dismissed or ignored in	
			the document. Flow patterns in Old and Middle River	
1.7	1	2 -	are altered to maintain exports, not just water quality.	
17	4	3-7	Multiple intakes should include new screened export	
1			locations in the south Delta as well.	

18	4	8-14	As noted above, the increased residence time allows for increased exposure to pollutants and high temperatures in the South Delta, and in the absence of sufficient flow from the San Joaquin River, the contaminated nutrients will simply stay in the South Delta. The inflow of the San Joaquin River is generally less than consumptive use in the South Delta so there will be large, stagnant areas. Unless the contaminant load is addressed, this will not necessarily be an improvement. Recent studies at UC Davis implicate chemical pollutants in the striped bass decline and it is possible that this will be exacerbated. These effects need to be included in the discussion and addressed.	
19	4	15-21	Citation for when, where and how "organic material" is kept "artificially low" in the Delta? Restored habitat will be subject to the same adverse conditions as described in comment 18. This needs to be included and addressed in the document. What will the change in consumptive use be with restored habitat?	
20	4	22-27	Again "are thought to" is a weak argument.	
21	4	36 ff	Implementation time. CCWD finds that for non- controversial projects in the Delta with no focused opposition, the planning-permitting-design time to construction time ratio is 2:1 (2 years planning, permitting and design for every year of construction). This project meets the "project in the Delta" criterion, but does not yet appear to meet the other two criteria.	
22	5	5-8	"Implementation of new intake and screen facilities and an isolated canal facility would require extensive engineering design, geotechnical investigations, site and alignment planning, land acquisition, site preparation, and construction." See comment 21	
23	6	24ff	"anticipated that". Again, this emphasizes the need for full discussion of adverse effects as well as hoped for benefits, and how the adverse effects will be dealt with.	
24	6	31	North Delta exports cannot "eliminate all negative effects of exports from the Delta", unless all exports, including north Delta exports, are zero.	
25	7	19 ff	"preferentially operate a new diversion"this presumes outcomes not yet demonstrated. As noted above, many adverse impacts come with new diversion locations, and depending on how it is operated, it could make more problems than it solves. How impacts are minimized will determine the preference of locations.	
26	8	4-44	This lists many of the reasons the new locations may not be preferential. Necessary bypass flows will require exporting from the south Delta if "water supply goals (p7, line 32) are to be met.	
27	9	23-26	"More demanding bypass flow requirements would	

			result in less water diverted in the north Delta facility and commensurate increase in south Delta diversions from the existing SWP and/or CVP export facilities." Demanding? Greater or larger would be more appropriate. Demanding is judgmental. At any rate, this sentence reinforces the tradeoff between north and south pumping and argues directly against the presumption of "preferential" as well as the overall tone of the document that assumes what is better without demonstrating it ("anticipated that", "assumed", "believed")	
28	10	29-31	Organic material load is reduced with the north delta diversion; where is it demonstrated this is better than south Delta, since this load no longer travels through the Delta.	
29	11	4 ff	Same as comment 24	
30	11	35 ff	This discussion only reinforces the comments made above about nutrients and organic matter and residence times and the location of where it is removed: we don't know, but the document pretends we do. It is not acceptable to presume one outcome when we all know that the outcome is "assumed", "believed" or "anticipated". The document needs an honest assessment throughout.	
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